

EXHIBIT A

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Brandon Blue (In pro per)
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San Diego, CA 92126

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ATTORNEY FOR (Name):

FOR COURT USE ONLY

Electronically FILED by
Superior Court of California,
County of Los Angeles
7/11/2023 11:47 AM
David W. Slayton,
Executive Officer/Clerk of Court,
By I. Valencia, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 1725 Main Street

MAILING ADDRESS: 1725 Main Street

CITY AND ZIP CODE: Santa Monica, CA 90401

BRANCH NAME: Santa Monica Courthouse

PLAINTIFF: Brandon Blue

DEFENDANT: NFL

☐ DOES 1 TO _____**COMPLAINT—Personal Injury, Property Damage, Wrongful Death**☐ **AMENDED (Number):**

Type (check all that apply):

☐ **MOTOR VEHICLE** ☐ **OTHER (specify):**☐ **Property Damage** ☐ **Wrongful Death**☒ **Personal Injury** ☒ **Other Damages (specify):** Discrimination

Jurisdiction (check all that apply):

☐ **ACTION IS A LIMITED CIVIL CASE**Amount demanded ☐ does not exceed \$10,000☐ exceeds \$10,000, but does not exceed \$25,000☒ **ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)**☐ **ACTION IS RECLASSIFIED by this amended complaint**☐ **from limited to unlimited**☐ **from unlimited to limited**

CASE NUMBER:

23SM CV 031021. **Plaintiff (name or names):** Brandon Bluealleges causes of action against **defendant (name or names):**

Discrimination leading to personal injury and emotional distress.

2. This pleading, including attachments and exhibits, consists of the following number of pages: 13

3. Each plaintiff named above is a competent adult

a. ☐ **except** plaintiff (name):(1) ☐ a corporation qualified to do business in California(2) ☐ an unincorporated entity (describe):(3) ☐ a public entity (describe):(4) ☐ a minor ☐ an adult(a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed(b) ☐ other (specify):(5) ☐ other (specify):b. ☐ **except** plaintiff (name):(1) ☐ a corporation qualified to do business in California(2) ☐ an unincorporated entity (describe):(3) ☐ a public entity (describe):(4) ☐ a minor ☐ an adult(a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed(b) ☐ other (specify):(5) ☐ other (specify):☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

SHORT TITLE:

Blue vs. NFL

CASE NUMBER:

4. ☐ Plaintiff (*name*):
is doing business under the fictitious name (*specify*):

and has complied with the fictitious business name laws.
5. Each defendant named above is a natural person
- a. ☒ **except** defendant (*name*): NFL
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (*describe*):

 (4) ☐ a public entity (*describe*):

 (5) ☒ other (*specify*):
Trade association.
- c. ☐ **except** defendant (*name*):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (*describe*):

 (4) ☐ a public entity (*describe*):

 (5) ☐ other (*specify*):
- b. ☐ **except** defendant (*name*):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (*describe*):

 (4) ☐ a public entity (*describe*):

 (5) ☐ other (*specify*):
- d. ☐ **except** defendant (*name*):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (*describe*):

 (4) ☐ a public entity (*describe*):

 (5) ☐ other (*specify*):
- ☐ Information about additional defendants who are not natural persons is contained in Attachment 5.
6. The true names of defendants sued as Does are unknown to plaintiff.
- a. ☐ Doe defendants (*specify Doe numbers*): _____ were the agents or employees of other named defendants and acted within the scope of that agency or employment.
- b. ☐ Doe defendants (*specify Doe numbers*): _____ are persons whose capacities are unknown to plaintiff.
7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (*names*):
8. This court is the proper court because
- a. ☐ at least one defendant now resides in its jurisdictional area.
- b. ☐ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
- c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.
- d. ☐ other (*specify*):
9. ☐ Plaintiff is required to comply with a claims statute, **and**
- a. ☐ has complied with applicable claims statutes, **or**
- b. ☐ is excused from complying because (*specify*):

PLD-PI-001

SHORT TITLE:

Blue vs. NFL

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10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):

- a. ☐ Motor Vehicle
- b. ☐ General Negligence
- c. ☒ Intentional Tort
- d. ☐ Products Liability
- e. ☐ Premises Liability
- f. ☐ Other (*specify*):

11. Plaintiff has suffered

- a. ☒ wage loss
- b. ☐ loss of use of property
- c. ☒ hospital and medical expenses
- d. ☒ general damage
- e. ☐ property damage
- f. ☒ loss of earning capacity
- g. ☒ other damage (*specify*):
Emotional distress, pain & suffering, permanent debilitating injuries.

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. **Plaintiff prays** for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages
- (2) ☒ punitive damages

The amount of damages is (*in cases for personal injury or wrongful death, you must check (1)*):

- (1) ☒ according to proof
- (2) ☐ in the amount of: \$

15. ☐ The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*):

Date: 07/11/2023

Brandon Blue

(TYPE OR PRINT NAME)



Brandon Blue

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

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CAUSE OF ACTION—Intentional Tort

Page _____

(number) _____

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): Brandon Blue (In pro per)

alleges that defendant (name): NFL

☐ Does _____ to _____

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff

on (date): 08/09/2020

at (place): NFL Films - 10950 Washington Blvd. Culver City, CA 90232

(description of reasons for liability):

1. The Plaintiff, Brandon Blue, brings this action against the Defendant, The National Football League (The NFL), for discrimination and harassment in violation of the Americans with Disabilities Act (ADA).
2. The Plaintiff, Brandon Blue, is a 42-year-old white male U.S. citizen and was employed by the Defendant from 11/11/2019 to approximately 8/9/2020 as a Systems Administrator contractor.
3. The Defendant, The NFL, is a sports league who is headquartered in NY & operates in all states.
4. During the Plaintiff's employment, the Defendant subjected the Plaintiff to discrimination and harassment on the basis of disability, including but not limited to: Denying doctor-ordered bed rest (Teams chats & phone calls), denying help with moving heavy objects (Teams chats), threat of employment termination if dangerous work was not performed alone, while injured (Patrick Villa (NFL) and Bryant Vandenburg (JDA)), name-calling about injuries (Teams chats), calling doubt to injuries at their core (Teams chats).
5. The discriminatory and harassing acts described above created a hostile work environment for the Plaintiff, and adversely affected the Plaintiff's job performance, compensation, and other terms and conditions of employment. They also led to additional injuries (8/9/2020) on top of existing injuries from 5/29/2020.
6. The Defendant's conduct described above violated ADA & led to permanent debilitating injuries on top of other permanent debilitating injuries.
7. Wherefore, the Plaintiff respectfully requests that this Court enter judgment in favor of the Plaintiff and against the Defendant, and award the following relief:
 - a. Compensatory damages in an amount to be determined at trial, including but not limited to back pay, front pay, emotional distress damages, and any other damages permitted by law;
 - b. Punitive damages in an amount to be determined at trial, in order to punish the Defendant for its wrongful conduct and to deter future unlawful conduct;
 - c. Injunctive relief, including but not limited to an order enjoining the Defendant from engaging in further discriminatory and harassing conduct, and requiring the Defendant to implement policies and procedures to prevent such conduct in the future;
 - d. Attorneys' fees and costs; and
 - e. Any other relief deemed just and proper.
8. The Plaintiff demands a trial by jury on all issues triable by jury.

WHEREFORE, Plaintiff prays for judgment against Defendant and for such other and further relief as this Court may deem just and proper.